



Office of Enforcement Expectations for Coordinators

Garrett Smith
Office of Price-Anderson Enforcement
Office of Enforcement

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Contractor Coordinator Challenges



- Most knowledgeable of the enforcement program
- Reporting recommendations not always accepted by management
- Voluntary nature of PAAA and WSH reporting





General Duties and Responsibilities



- You are the "Go To" Person
 - Primary point-of-contact with Enforcement
 - Frequent and open communication
- Contractor coordinator is the liaison with both the DOE Site Office and Enforcement
- DOE coordinator regularly communicates with both the contractor coordinator and Enforcement



General Duties and Responsibilities (cont'd)



- Access to and support of senior management
- Advise management on enforcement issues
- Maintain awareness of the contractor's regulatory compliance status
- Champion excellence for your organization
 - Goal is to have most issues identified by assessment instead of events
 - Culture of proactive, continuous improvement



Working Knowledge



- Understand the Enforcement Process
- Be familiar with applicable requirements
- Know the reporting requirements
- Understand the implementing documents for your site



Program Implementation



- Be aware of contractor activities
- Have a "questioning attitude" regarding potential nuclear/safety/security concerns
- Be aware of nuclear/safety/security incidents
- Trending programmatic issues, negative trends, repetitive issues
- Training on-site personnel (including management)



Noncompliance Reporting



- Reporting should be timely. Expectation is that reporting is done within:
 - 20 calendar days after determining that a noncompliance exists for nuclear and worker safety
 - For security noncompliances, use reporting times in DOE Manual 470.4-1
- Use a reasonable timeframe for evaluating noncompliances for repetitiveness.
 - Annual reviews are not timely



Corrective Actions



- Expectations for timeliness Investigations, causal analyses, and development of corrective actions should typically be completed within:
 - 45 days of identifying the noncompliance for nuclear and WSH
 - 60 days after determining a security incident has occurred
- Effectiveness reviews of corrective actions are conducted for significant noncompliances
- NTS/SSIMS reports and corrective actions are provided as input to the site lessons-learned process, as appropriate



Noncompliance Closure



- Contractor Coordinator is expected to:
 - Track the status of corrective actions
 - Verify and validate corrective actions
 - Mark NTS reports as "complete"
- DOE Coordinator is expected to:
 - Track the status of NTS reports
 - Verify the completion of corrective actions
 - Verify and validate that NTS reports are ready for closure



Non-Reportable Noncompliances



- Non-reportable noncompliances are tracked locally
 - Contractor Coordinator
 - Closure validation (similar to NTS report)
 - DOE Coordinator
 - No verification is needed for closure
 - Periodically review status and trends of local noncompliances
- Enforcement staff will review these issues during Regulatory Assistance Reviews



Contractor Coordinator Oversight



- Contractor Coordinators assess their programs
 - Internal self-assessments
 - External assessments, such as EFCOG peer reviews
- Monitor performance metrics. Some suggested metrics:
 - Average time to screen an issue
 - Number of issues screened
 - Average time to report an issue



DOE Coordinator Oversight



- Oversee the contractor program
 - Review performance metrics
 - Periodic assessments, review contractor assessments
 - Follow-up to previous Enforcement activity and program reviews
- Maintain awareness of compliance status from:
 - Nuclear/safety/security incidents
 - ORPS reports
 - Inspections nuclear/safety/security
 - Contractor self-assessments, external assessments, peer reviews
 - Locally tracked noncompliances (non-reportable)



Enforcement Situations: Contractor Coordinator



- Facilitate requests for information
- Coordinate onsite investigations, enforcement conferences, program reviews
- Actively participate in DOE / Contractor dialogue



Enforcement Situations: DOE Coordinator



- Provide input into the enforcement process
 - Investigation strategy
 - Enforcement Conference
 - Post Conference discussions
 - Finalization of enforcement documents and actions



DOE Program Office Coordinators



- Regular communication with Enforcement
- Regular communication with the DOE coordinators at your sites
- Share lessons learned among your site offices
- Maintain awareness of NTS and Security Incident Reports
- Provide input to the enforcement process



Communicating with Enforcement



- How often should we talk?
- The goal is to have open and candid communication